IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

PERSONALWEB TECHNOLOGIES, LLC,

Plaintiff,

vs.

GOOGLE INC. AND YOUTUBE, LLC,

Defendants.

Civil Action No. 11-cv-656 (LED)

JURY TRIAL DEMANDED

Declaration of Ronald D. Lachman in Support of PersonalWeb's Opposition to Defendants' Motion to Transfer

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- 1. My name is Ronald Lachman. I am over the age of twenty-one and am in all respects competent to make this declaration. I have personal knowledge of the matters set forth below, and the factual matters set forth below are true and correct.
- 2. I am an inventor of U.S. Patent Nos. 5,978,791, 6,415,280, 6,928,442, 7,802,310, 7,945,539, 7,945,544, 7,949,662, 8,001,096, 8,082,262, and 8,099,420 (collectively, the "Patents").
 - 3. I currently live in Northbrook, Illinois.
- 4. I understand that PersonalWeb is a current assignee of the Patents, and that PersonalWeb has filed a number of actions in the United States District Court for the Eastern District of Texas alleging infringement of the Patents.
- 5. I understand that as an inventor of both patents at issue in this case, I may be asked to testify in one or more of the actions.
- 6. If needed, I am willing to travel to the Eastern District of Texas to testify at trial in any of the actions.

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7. Traveling to the Eastern District of Texas to testify at trial will pose no inconvenience, and I will voluntarily agree to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this ____ day of March, 2012, at Northbrook, Illinois.

Ronald D. Lachman